

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JANE DOE,

Plaintiff,

v.

LEON BLACK,

Defendant.

Case No. 1:23-cv-06418-JGLC

NOTICE OF MOTION FOR SANCTIONS PURSUANT TO FED. R. CIV. P. 11

PLEASE TAKE NOTICE that, the Defendant, Leon Black (“Defendant” or “Black”), hereby moves this Court pursuant to Fed. R. Civ. P. 11(c) for an order imposing sanctions Plaintiff’s counsel Jeanne Christensen, and her law firm, Wigdor LLP, because:

- (i) Plaintiff and her counsel violated Fed. R. Civ. P. 11(b)(3), by asserting factual contentions in the Complaint in this action without any evidentiary support, without any likelihood of obtaining any evidentiary support, and without making any reasonable inquiry regarding the evidentiary support for their contentions. These baseless factual contentions include the claims that Plaintiff was sex trafficked by Jeffrey Epstein, sexually assaulted by Defendant, and groomed and sex trafficked by “Elizabeth” beginning after her 16th birthday.

PLEASE TAKE FURTHER NOTICE that Plaintiff’s papers in opposition to this motion, and Defendant’s reply papers, shall be served in accordance with Local Civil Rule 6.1.

Dated: New York, New York
September 20, 2023

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By : /s/ Susan Estrich

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